

**United States Court of Appeals**  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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**No. 23-1179****September Term, 2023****USTC-10647-21L****Filed On:** June 13, 2024

Alon Farhy,

Appellee

v.

Commissioner of Internal Revenue,

Appellant

**BEFORE:** Srinivasan, Chief Judge; Henderson, Millett, Pillard, Wilkins,  
Katsas, Rao, Walker, Childs, Pan, and Garcia, Circuit Judges; and  
Rogers, Senior Circuit Judge

**ORDER**

Upon consideration of appellee's petition for rehearing en banc, and the  
absence of a request by any member of the court for a vote, it is

**ORDERED** that the petition be denied.

**Per Curiam**

**FOR THE COURT:**

Mark J. Langer, Clerk

BY: /s/

Daniel J. Reidy

Deputy Clerk